

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KLEEN PRODUCTS LLC, et al.,

Plaintiffs,

v.

PACKAGING CORPORATION OF
AMERICA, et al.,

Defendants.

No. 1:10-cv-05711

Honorable Harry D. Leinenweber

**PLAINTIFFS' SUPPLEMENTAL REPLY IN SUPPORT OF
MOTION TO COMPEL DEFENDANT ROCKTENN CP, LLC TO AMEND ITS
PRIVILEGE LOG AND PRODUCE CERTAIN DOCUMENTS**

Plaintiffs submit this short supplemental reply to clarify a statement in RockTenn's Response to Plaintiffs' Supplemental Brief (ECF No. 608). Specifically, RockTenn asserts that "Plaintiffs refused to meet and confer with RockTenn during the re-review process." *Id.* at 1. That statement is misleading at best. In fact, RockTenn notified Plaintiffs by e-mail late on Friday, January 31, 2014 (after 5 p.m.) that it was completing a re-review of its privilege log and would be making a supplemental document production. In that e-mail, RockTenn's counsel also asked if Plaintiffs were interested in meeting and conferring. On February 2, 2014, Plaintiffs responded that they would gladly meet and confer after having an opportunity to assess RockTenn's revised privilege log and supplemental document production. RockTenn produced its revised privilege log 12 days later on February 14 and sent Plaintiffs certain previously withheld documents on February 8 and February 14 (received on February 10 and 17 respectively). The parties then spoke briefly on February 21, 2014, but did not engage in any substantive discussions about the revised privilege log or documents produced – though Plaintiffs never refused to do so.

Dated: March 12, 2014

Respectfully submitted,

/s/ Michael J. Freed

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